

EXHIBIT 4



a professional corporation

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Via first class mail and email (CKass@proskauer.com)

Colin Kass
Proskauer Rose LLP
1001 Pennsylvania Ave, N.W.
Suite 600 South
Washington, DC 20004-2533

Re: In re Automotive Parts Antitrust Litigation (Master Case No. 2:12-md-02311)

Dear Colin:

I am writing to follow up on your call of September 1, 2015 concerning the subpoenas issued to various original equipment manufacturers and affiliated entities ("OEMs") in the above litigation. I write on behalf of all Defendants, Dealer Plaintiffs and End Purchaser Plaintiffs, and Public Entity Plaintiffs (collectively "Parties").

In your call, you indicated that you were calling on behalf of "most" of the subpoenaed OEMs (the "Coordinating OEMs") and requested that: (1) the Parties and the Coordinating OEMs arrange for a "summit" to discuss unspecified common issues; and (2) that the Parties agree to a common response date for the Coordinating OEMs. We understand that you are acting as the liaison for the Coordinating OEMs, and assume that you will promptly communicate this letter to those other Coordinating OEMs.

As the Coordinating OEMs are aware, the Parties have been reaching out to all identified counsel for the various OEMs served to discuss reasonable extensions for written responses and objections, and to set a schedule for meet and confer and production. The Parties have also been making best efforts to schedule initial meet and confer calls with OEM entities so that any questions and particular issues may be promptly addressed.

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Although the Parties believe that the significant issues relating to the subpoenas are more productively addressed in conversations and negotiations with each OEM, the Parties are willing to accommodate Coordinating OEMs' request for a summit on the following terms:

1. You identify the Coordinating OEMs on behalf of whom your proposal is made;
2. The Coordinating OEMs identify in writing at least two days in advance of the summit the specific common issues to be addressed;
3. The Coordinating OEMs agree to hold the summit no later than September 18, 2015. In that regard, please identify three dates and times for a summit. Since a number of the Parties are on the West Coast, please propose times between noon and 5 p.m. EDT. Also, please note that a number of counsel will be unavailable on September 14th and 15th. Once we receive your proposed dates, we will determine as quickly as possible which of the dates are workable for the Parties; and
4. The Coordinating OEMs agree to set a response and production schedule consistent with the discussion below.

While the Parties want to make every effort to accommodate the Coordinating OEMs' requests to address any common issues and questions, we hope that the Coordinating OEMs will consider that the Parties need to avoid unreasonable delay. The data and documents sought by the subpoenas are necessary to the Parties' class certification briefing in the automotive wire harness cases and require extensive evaluation.

In addition, the Parties' agreement to address the Coordinating OEMs' request for a group summit or to address any common issues in a summit forum, does not relieve any Coordinating OEM of its obligation to respond to and/or comply with the subpoena, nor can the request for a summit be used as a reason for delay or to not go forward with setting a schedule.

A number of subpoenaed entities have already agreed to response and production dates. Since we do not know the identity of the Coordinating OEMs, we do not know whether any of the Coordinating OEMs are among those who have already agreed to set dates. Please note that the following proposal will not apply to any OEMs that have already agreed to set dates.

With the above understandings, the Parties are willing to hold the summit. We ask that the Coordinating OEMs also agree to schedule proposed below:

September 30, 2015: Written responses and objections due; and October 31, 2015: Rolling production will begin.

The Parties also request that the Coordinating OEMs provide substantive responses on September 30th, and not merely use the extension to make "boilerplate" objections. In

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addition, we ask that the Coordinating Parties immediately continue or begin to meet and confer with the Parties on an individual basis to begin to address substantive issues or concerns, and to begin discussions including as to transactional data production and the scope of the requests.

We look forward to your prompt response.

Very truly yours,



Sheldon Klein

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